

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

BIKACHI AMISI,)	
Plaintiff)	
)	
v.)	Civil Action No. 3:20cv218
)	
BRYAN BROWN, et al.,)	
Defendants.)	

DECLARATION OF ROY TOWNSEND, JR.

I, Roy Townsend, Jr., declare as follows:

1. I am a correctional officer at Riverside Regional Jail. I base this declaration on my personal knowledge.

2. On the Google Maps photo that was marked as Exhibit 2 during my deposition, the red arrow that has been added points to the front entrance of the main Jail of Riverside Regional Jail, the red circle is where the intake area is of the Pre-release Center, and a red square is at the front entrance to the Pre-release Center.

3. The photographs being filed at the same time as this declaration and designated as Exhibits show the following:
 - a. Exhibit 4 photograph shows the roundabout with flags that fronts the main entrance to the Jail;
 - b. Exhibit 5 photograph shows the Pre-release Center, looking from the main Jail parking lot toward it;
 - c. Exhibit 6 photograph shows the inmate intake entrance on the back side of the Pre-release Center (the SP6 door, showing the metal sign posted at that door that was there on September 5, 2019 too, stating "Inmate Intake Only All Visitors Please Report To Lobby On the Opposite Side Of The Building");

- d. Exhibit 9 photograph shows the sally port between the SP6 and SP5 doors in the Pre-release Center and the SP3 entrance to the female locker room from there;
 - e. Exhibit 10 photograph shows the wall in the intake area along which Bikachi Amisi first sat on September 5, 2019, the door to the female locker room from the intake area, and the barrier around the intake desk facing that side;
 - f. Exhibit 11 photograph shows the view if sitting in the intake desk chair facing toward the SP5 door;
 - g. Exhibit 12 photograph shows another view if sitting in the intake desk chair facing toward the SP5 door and the wall along which is the door to the female locker room in the intake area;
 - h. Exhibit 13 photograph shows the intake desk chair in which I was sitting on September 5, 2019, which sits very low and was broken even then so that the height does not adjust, and the location of the telephone at intake desk;
 - i. Exhibit 14 photograph shows the location of the telephone at the intake desk, in the corner of the desk furthest away from the side facing the SP5 door; and
 - j. Exhibit 15 photograph illustrates how high up the barrier around the intake desk is with respect to a person sitting in the chair there, and also how the barrier around the intake desk blocks the telephone from being seen if outside of the desk.¹
4. Exhibit 8 is a floor plan of part of the Pre-release Center, which I understand is page 2 of what was marked as Plaintiff's Dep. Ex. 13 at someone else's deposition. References showing the location of the SP2-SP6 doors have been added to that floor plan.

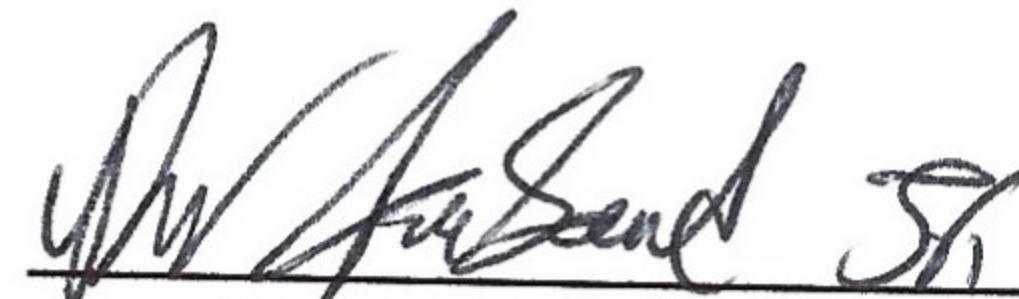
5. Attached is the certificate I received when I graduated from the Jailor Academy in 2017.

¹I understand that these photographs were taken by attorneys in this case during an inspection of Riverside Regional Jail and the Pre-release Center on May 25, 2021 that was subpoenaed by the plaintiff's attorney, and that the redactions to the photographs were made to accommodate Riverside Regional Jail Authority's security and inmate privacy interests, to allow the photographs to be filed in the public record. In any event, the material redacted from the photographs is not as that material would have been on September 5, 2019.

6. I never understood Ms. Amisi to be a newly-hired nurse arriving at Riverside Regional Jail for orientation on her first day to work in the Jail on September 5, 2019, until after the Weekend Coordinator had come to the Pre-release Center intake area and I later learned that someone in the main Jail had subsequently been contacted and they had determined that. Rather, I understood Ms. Amisi to be saying that she was reporting for the orientation held for weekenders in the Pre-release Center and everything indicated that she was, and I immediately began looking through my paperwork and telephoning the Weekender Coordinator to determine whether she had paperwork for Ms. Amisi. At no time during my dealings with Ms. Amisi did I believe that I was doing anything that violated Ms. Amisi's constitutional rights or any other rights, nor did I have any knowledge or reason to believe that anyone else was. I was trying to help her.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Prince George County, Virginia
on June 17, 2021



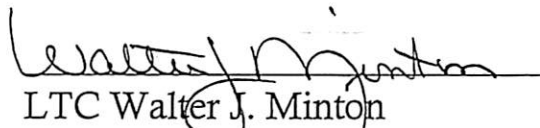
Roy Townsend, Jr.


DISTINGUISHED OFFICER AWARD

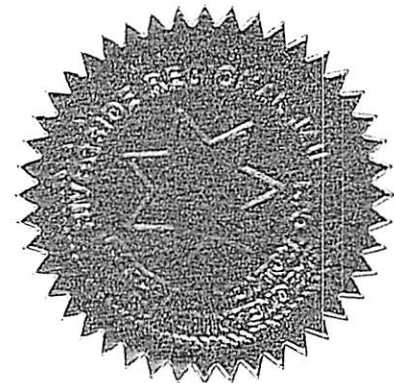
Riverside Regional Jail Authority

Officer Roy Townsend Jr.

Officer Roy Townsend Jr. achieved academic excellence by being named the Valedictorian of the 87th Basic Jailer Academy in August 2017 with an academic score of 96.6. Your achievement is a credit to you, the Basic Jailer Academy and the Riverside Regional Jail Authority.


LTC Walter J. Minton
Assistant Superintendent


Colonel Jeffery L. Newton, CJM
Superintendent



Date: October 31, 2017

CONFIDENTIAL

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